

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**Weishoff and Richards, LLC**

**Attn: Travis J. Richards, Esq. (TR-2556)**

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**Counsel for KSRK Family, LLC**

In Re:

Jennie I. Pless

Case No.: 19-21157

Chapter: 13

Hearing Date: August 14, 2019

Judge: Andrew B. Altenburg

**CREDITOR'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN**

I, Travis J. Richards, attorney for creditor, KSRK Family, LLC, residential landlord of the above captioned debtor, object to the debtor's plan for the following reason(s);

1. The debtor's plan fails provide adequate assurances that debtor will "promptly cure" the pre-petition default in debtor's residential lease in violation of 11 USC 365(b)(1)(A).

2. The debtor has failed to provide adequate assurance of future performance under debtor's residential lease in violation of 11 U.S.C. 365(b)(1)(C).

In the event the debtor amends the Chapter 13 Plan to cure pre-petition default owed in rent within eighteen (18) months of the filing of the petition, the undersigned will not appear at the Confirmation Hearing and the aforesaid objection should be deemed waived.

DATE: August 6, 2019

/s/Travis J. Richards

Travis J. Richards

Attorney for Creditor